August 11, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov

Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. The Synergy Company of Utah, LLC supports the continued allowance of the following substance(s):

Name of Substance	***Location on National List (ie. 205.605(a))***	***Reason for continued allowance.***	***Supporting Documents (example: research data or other international organic programs***
Enzymes	205.605(a) nonsynthetics allowed	No organic material is available to replace enzymes, which provide a necessary function, which is to assist with digestion & bioavailability of organic products formulated by Synergy	Our supplier, who is the manufacturer of enzymes used in Synergy's formulations, will be submitting documentation to NOP on enzymes
Yeast	205.605(a) nonsynthetics allowed	No other material is available to replace the function of yeast in manufacture of vitamin and mineral nutrients that are used in organic products formulated by Synergy; Synergy believes that yeast should be allowed to	Our supplier, who manufacturers the nutrients used in our formulas and who uses the yeast as part of that process, will submit documentation to

		remain on this list, until such time as the NOSB reclassifies yeast as an agricultural product. Synergy has submitted a separate comment on that point in support of Marroquin's petition.	NOP on yeast
Chlorine materials – disinfecting and sanitizing food contact surfaces	205.605(b) synthetics allowed	In our manufacturing facility, chlorine materials are the only products available on the market that will sanitize particular food contact surfaces	No change since original TAP review; sanitizers are required by State of Utah Department of Agriculture as part of food manufacturing process to ensure sanitized food contact surfaces
Silicon dioxide	205.605(b) synthetics allowed	When certain fruits or vegetables are powdered, they will not remain powdered without the use of an anti-caking agent. To date, despite extensive research, Synergy and its processing partners have not been able to replace silicon dioxide with an agricultural product and achieve the required functionality	Our supplier, who processes vegetable and fruit powders for Synergy, will submit documentation to NOP on the lack of a suitable alternative material.
Tocopherols	205.605(b) synthetics allowed	Tocopherols are an irreplaceable component of several of Synergy's formulations; there is no substitute material	There are no changes that we are aware of since the original TAP review of this material; the manufacturer of the tocopherol

			Synergy uses is submitting comments to NOP
Kaolin (aluminum silicate, mineral)	205.605(a) – allowed non-synthetic	Synergy's supplier of tocopherol uses kaolin as a carrier for powdered tocopherols. The physical adsorption process of liquid tocopoherols by kaolin involves no chemical changes.	Synergy's supplier will be providing documentation of the process.
Calcium carbonate	205.605(a) – allowed non-synthetic	Synergy's supplier of tocopherol uses Calcium carbonate as a carrier for powdered tocopherols. The physical adsorption process of liquid tocopoherols by Calcium carbonate involves no chemical changes.	Synergy's supplier will be providing documentation of the process.

Sincerely,

Susan Ulery, Director of Regulatory Affairs
The Synergy Company

Cc: National Organic Standards Board
Cc: Organic Trade Association